PATRICIA A. SAVAGE, SBN 236235 1 SAVAGE & LAMB, PC 1550 Humboldt Road, Suite 4 2 Chico, CA 95928 Telephone: (530) 592-3861 3 Fax: (530) 592-3865 4 Attorney for Claimants, 5 JAMES P. HUGES and SIERRA S. METZ, DYLAN H. BARTELS and SAVANNAH D. GALLARDO 6 7 8 UNITED STATES BANKRUPTCY COURT 9 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION 10 In re) Case No. 19-30088-DM 11 PG&E Corporation,) Chapter 11) Lead Case, Jointly Administered 12 and) MOTION PURSUANT TO FED. R. BANKR. 13 PACIFIC GAS AND ELECTRIC PROC. 7015 AND 7017 TO ENLARGE TIME COMPANY,) TO FILE PROOF OF CLAIM PURSUANT 14 TO FED. R. BANKR. PROC. 9006(b)(1) Debtors. 15 Date: September 13, 2022 Time: 10:00 a.m. (Pacific Time) [x] Affects both Debtors 16 Place: Telephonic/Video Appearances Only 17 *All paper shall be filed in the Lead Case, United States Bankruptcy Court No. 19-30088-DM Courtroom 17, 450 Golden Gate Ave., 16th Floor 18 San Francisco, CA 19 Judge: Hon. Dennis Montali 20 Objection Date: August 30, 2022 21 **BACKGROUND** 22 Pursuant to Rules 015 and 7017 of Federal Rules of Bankruptcy Procedure, which incorporate 23 Federal Rules of Civil Procedure 15 and 17, by this motion ("Motion"), JAMES P. HUGHES, 24

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SIERRA S. METZ, DYLAN H. BARTELS, and SAVANNAH D. GALLARDO ("Movants") move this Court for an order expanding the time to file a Proof of Claim, and allow, Claim Numbers (not yet assigned), attached to the Declaration of Patricia A. Savage as Exhibit 1, to be considered timely filed. Claim Numbers (not yet assigned) were filed on March 31, 2022 (Hughes/Metz) and May 31, 2022 (Gallardo/Bartels), respectively.

This Motion is based upon the points and authorities set forth herein and the concurrently filed Notice of Heating in support of the Motion, in addition to any evidence or oral argument presented at the time of any hearing on this matter. In support thereof, the Movants, by and through their undersigned counsel, respectfully represent as follows:

SUMMARY OF RELIEF REQUESTED

A proof of claim may be deemed timely upon a showing of excusable neglect and lack of prejudice. In this case, due to a variety of stressors arising from the Camp Fire, the impact of the Covid 19 pandemic, as well as a misunderstanding as to the legitimacy of his claim, Movants were unable to timely file their proof of claim. Because there is no danger of prejudice to the Debtors as Debtors' estates are solvent, and all creditors stand to be paid, the Motion should be granted to allow these survivors to have their claims deemed timely. This Court must determine whether to grant the Motion.

FACTUAL BACKGROUND

The general bar date in these cases was October 21, 2019 ("Original Bar Date"). The process for submission of timely claims was continued after the Original Bar Date. Pursuant to the Stipulation Between Debtors and Official Committee of Tort Claimants to Extend Bar Date for Fire Claimants and for Appointment of Claims Representative (Dkt No. 4651), the Original Bar Date was extended for the benefit of Unfiled Fire Claimants to December 31, 2019 at 5:00 p.m. (Prevailing Pacific

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Time). The Debtors' Chapter 11 plan ("Plan") was confirmed by court order on June 20, 2020, and pursuant to the Notice of Effective Date, the Plan became effective as of July 1, 2020.

JAMES P. HUGES and SIERRA S. METZ are survivors of the Camp Fire that occurred on November 8, 2018. Specifically, Movants lived at the property located at 6435 Graham Road, Paradise, CA 95969 ("Property 1"). While the property was not destroyed by the Camp Fire, certain personal property belonging to Movants was destroyed. Movants were forced to evacuate due to the dangers of the fire, were temporarily displaced, and had to begin rebuilding their lives in the town of Paradise that was forever changed by the fire.

DYLAN H. BARTELS and SAVANNAH D. GALLARDO are survivors of the Camp Fire that occurred on November 8, 2018. Specifically, Movants lived at the property located at 14371 Vine Street 3, Magalia, CA 95954 ("Property 2"). While the property was not destroyed by the Camp Fire, personal property belonging to the Movants was destroyed. Movants were forced to evacuate along back roads due to the dangers of the fire, were temporarily displaced, and had to begin rebuilding their lives in the town of Magalia that was severely and forever affected by the Camp Fire.

Due to multiple traumas, the immense pressure on Movants to reestablish their lives following the fire, and a misunderstanding as to the legitimacy of their claims based on a mistaken belief that they did not qualify for payment since their homes were not burned, they did not contact and retain counsel until recently. Therefore, no proof of claim was timely filed on behalf of Movements. It was not until after the extended bar date and Claims Questionnaire deadline that Movants discovered they should file a Proof of Claim for their losses. Therefore, it is respectfully requested the Court grant such relief.

LEGAL ARGUMENT

In a Chapter 11 case, the time to file a proof of claim may be extended under certain circumstances. Fed. R. Bank. Pro. 3003(c)(3); Fed. R. Bank. Pro. 9006(b)(1). The bankruptcy court

has "broad equitable powers" in a Chapter 11 case with respect to the timing requirement for proofs of claim. *Pioneer Inventory Services v. Brunswick Associates Limited Partnership*, 507 U.S. 380, 389 (1993). All in all, Rule 9006(b)(1) allows "late filings caused by inadvertence, mistake, or carelessness, not just those caused by intervening circumstances beyond the party's control." Id., at 381. Even a creditor that did in fact receive notice may file a proof of claim notwithstanding the expiration of a claims bar date in a Chapter 11 case upon a showing of "excusable neglect." Id. at 394-95 ("Had respondents here been prevented from complying with the bar date by an act of God or some other circumstance beyond their control, the Bankruptcy Court plainly would have been permitted to find 'excusable neglect' [under FRBP 9006].").

In considering whether a creditor's failure was the product of "excusable neglect," the court should take "account of all relevant circumstances surrounding the party's omission," including "the danger of prejudice to the debtor, the length of the delay and its potential impact on judicial proceedings, the reason for the delay, including whether it was within the reasonable control of the movant, and whether the movant acted in good faith." Id. at 395; see also Corning v. Corning (In re Zilog, Inc.), 450 F.3d 996 (9th Cir. 2006) (noting Pioneer's non-exhaustive list of relevant factors). Again, a late-filed proof of claim is allowable where a creditor had actual notice of the bankruptcy but, due to some external reason, failed to file a proof of claim or did not realize that she had to before the bar date. See, e.g., ZiLOG, Inc. v. Corning (In re ZiLOG, Inc.), 450 F.3d 996, 1003-07 (9th Cir. 2006) (applying the Pioneer factors). All in all, Rule 9006(b)(1) allows "late filings caused by inadvertence, mistake, or carelessness, not just those caused by intervening circumstances beyond the party's control." Pioneer, 507 U.S. at 381. Here, consideration of all four Pioneer factors—as well as a fifth engrafted onto the Pioneer analysis by some courts—weighs in favor of Movants.

Because in this case there is no danger of prejudice to the Debtors, the first Pioneer factor weighs overwhelmingly in Movants' favor. Debtors' estates are solvent, and all creditors stand to be

1 paid. See, e.g., In re Best Payphones, Inc., 523 B.R. 54, 75-6 (Bankr. S.D.N.Y. 2015) and In re 2 Sheehan Mem'l Hosp., 507 B.R. 802, 803 (Bankr. W.D.N.Y. 2014) (where the chapter 11 estate is 3 solvent, "the proper remedy for a late filing is not the expungement of a claim, but its allowance as a 4 tardily filed claim only.). Secondly, immediately upon receiving all the necessary in formation the 5 Subject Proof of Claim was filed. Thirdly, the delay in filing the Subject Proof of Claim is reasonable considering the traumas claimant has suffered since the fire. Lastly, any prospect of prejudice beyond 6 solvency is unlikely given (a) all distributions have not yet been made; and (b) the value of Movant's 7 8 claims relative to the value of Debtors' estates is low. See, e.g., In re Keene Corp., 188 B.R. 903. 9 910 (Bankr. S.D.N.Y. 1995) (size of the late claim in relation to the estate is a consideration in determining prejudice). 10 Under Rules 7015 and 7017 of Federal Bankruptcy Procedure (which incorporate Federal 11 12 Rules of Civil Procedure 15(c) and 17(a)(3)) because there is a lack of bad faith on the part of the Movant, it is respectfully requested the Court allow an extension of the bar date required to effectuate 13 14 the purpose of Rules 7015 and 7015. It is respectfully requested the mistake should be allowed to be 15 corrected by permitting the late filing of the Proof of Claim under Bankruptcy Rule 9006(b). // 16 // 17 // 18 19 20 // // 21 // 22 23 // // 24

CONCLUSION

For the reasons set forth above, Movants respectfully request that this Court enter an order pursuant to Bankruptcy Rules 7015, 7017, 9006(b)(1) as follows:

- 1. Granting this Motion;
- 2. Directing that Exhibit 1, the Proof of Claim, Claim Number (not yet assigned), be deemed timely filed;
- 3. Granting such other or further relief as the Court deems just and proper.

Dated: August 16, 2022

Patricia Savage

Patricia A. Savage
Attorney for Claimants and Movants

PATRICIA A. SAVAGE, SBN 236235 1 **SAVAGE & LAMB, PC** 1550 Humboldt Road, Suite 4 2 Chico, CA 95928 1550 Humboldt Road, Suite 4 Chico, CA 95928 4 Telephone: (530) 592-3861 Fax: (530) 592-3865 5 Attorney for Claimants 6 JAMES P. HUGHES and SIERRA S. METZ, DYLAN H. BARTELS and SAVANNAH D. GALLARDO 7 UNITED STATES BANKRUPTCY COURT 8 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION 9 In re Case No. 19-30088-DM 10 PG&E Corporation, Chapter 11 11 Lead Case, Jointly Administered 12 and **ORDER GRANTING MOTION TO** 13 PACIFIC GAS AND ELECTRIC ALLOW/DEEM TIMELY LATE FILING COMPANY,) OF CLAIM BY JAMES HUGHES AND 14) SIERRA METZ, AND DYLAN BARTELS Debtors.) AND SAVANNAH GALLARDO 15 [x] Affects both Debtors Date: September 13, 2022 16 Time: 10:00 a.m. (Pacific Time) *All paper shall be filed in the Lead Case, Place: Telephonic/Video Appearances Only 17 No. 19-30088-DM United States Bankruptcy Court 18 Courtroom 17, 450 Golden Gate Ave., 16th Floor 19 San Francisco, CA 20 Judge: Hon. Dennis Montali Objection Date: August 30, 2022 21 James Hughes and Sierra Metz, and Dylan Bartels and Savannah Gallardo (hereinafter 22 collectively referred to as "Movants"), having filed their motion to Allow/Deem Timely Late 23 Filing Proof of Claim, by which Movant seeks to have their claims deemed timely; no 24 ORDER GRANTING MOTION TO ALLOW/DEEM TIMELY LATE FILING OF CLAIM BY JAMES $ar{}$ HUGHES AND SIERRA METZ, AND DYLAND BARTELS AND SAVANNAH GALLARDO -1

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interested party having timely objected to the motion; and the relief set forth herein appearing to be well grounded; accordingly, it is

ORDERED, Proof of Claim (claim number not yet assigned), filed on behalf of James
Hughes and Sierra Metz, is deemed timely; and it is further

ORDERED, Proof of Claim (claim number not yet assigned), filed on behalf of Dylan Bartels and Savannah Gallardo, is deemed timely; and it is further

ORDERED, the Proof of Claims and Asserted Fire Victim Claims shall for all purposes be treated and classified as Fire Victim Claims under the Plan, and shall be fully assumed by, and the sole responsibility of, the Fire Victim Trust and subject to the Channelling Injunction, to be administered, processed, settled, disallowed, resolved, liquidated, satisfied and/or paid in accordance with the Fire Victim Trust Agreement and the Fire Victim Claims Resolution Procedures.

ORDERED, nothing herein shall be construed to be a waiver by the Debtors or the Reorganized Debtors, as applicable, the Fire Victim Trust, or any other party in interest of any right to object to the Asserted Fire Victim Claims or the Proof of Claim on any grounds other than the untimely filing thereof.

ORDERED, nothing herein shall be construed to be a waiver by Movants of their rights to oppose any asserted challenge to the Asserted Fire Victim Claims or the Proof of Claim.

ORDERED, this Court shall retain jurisdiction to resolve any disputes or controversies arising from the Stipulation of this Order.

** END OF ORDER **

ORDER GRANTING MOTION TO ALLOW/DEEM TIMELY LATE FILING OF CLAIM BY JAMES HUGHES AND SIERRA METZ, AND DYLAND BARTELS AND SAVANNAH GALLARDO – 2

Exhibit 1

PATRICIA A. SAVAGE, SBN 236235	
SAVAGE & LAMB, PC 1550 Humboldt Road, Suite 4	
Chico, CA 95928	
1550 Humboldt Road, Suite 4 Chico, CA 95928	
Telephone: (530) 592-3861	
Fax: (530) 592-3865	
Ave. C. Cl.:	
Attorney for Claimants JAMES P. HUGES and SIERRA S. MET.	Z,
DYLAN H. BARTELS and SAVANNAH	
UNITED STATES	S BANKRUPTCY COURT
NORTHERN DISTRICT OF CAI	LIFORNIA, SAN FRANCISCO DIVISION
In re) Case No. 19-30088-DM
PG&E Corporation,) Chapter 11
•) Lead Case, Jointly Administered
and)) DECLARATION OF PATRICIA A.
PACIFIC GAS AND ELECTRIC) SAVAGE IN SUPPORT OF MOTION
COMPANY,) PURSUANT TO FED. R. BANKR. PROC) 7015 AND 7017 TO ENLARGE TIME TO
Debtors.) FILE PROOF OF CLAIM PURSUANT
[x] Affects both Debtors	TO FED. R. BANKR. PROC. 9006(b)(1)
****	Date: September 30, 2022
*All paper shall be filed in the Lead Case, No. 19-30088-DM	Time: 10:00 a.m. (Pacific Time) Place: Telephonic/Video Appearances Only
	United States Bankruptcy Court
	Courtroom 17, 450 Golden Gate Ave., 16 th Floor
	San Francisco, CA
	Judge: Hon Dennis Montali
	Judge: Hon. Dennis Montali
I, Patricia A. Savage, declare as follow	Objection Date: August 30, 2022
-	
DECLARATION OF PATRICIA A. SAVAGE	IN SUPPORT OF MOTION PURSUANT TO FED. F

- 1. I am an attorney at law duly licensed to practice before all state and federal courts of the State of California.
- 2. My firm represents wildfire victims who sustained losses from the Camp Fire in 2018. My firm has timely filed on behalf of approximately 45 claimants with Prime Clerk for losses our clients suffered as a result of the Northern California Fires in 2018.
- 3. James P. Hughes and Sierra S. Metz are survivors of the Camp Fire that occurred in 2018. James P. Hughes and Sierra S. Metz resided at 3435 Graham Road, Paradise, CA 95969.
- 4. Attached hereto as Exhibit 2 is a true and correct copy of the Proof of Claim we prepared for Mr. Hughes and Ms. Metz on the Prime Clerk website on March 31, 2022.
- 5. Dylan H. Bartels and Savannah D. Gallardo are survivors of the Camp Fire that occurred in 2018. Dylan H. Bartels and Savannah D. Gallardo resided at 14371 Vine St. 3, Magalia, CA 95954.
- 6. Attached hereto as Exhibit 3 is a true and correct copy of the Proof of Claim we prepared for Mr. Bartels and Mrs. Gallardo on the Prime Clerk website on May 31, 2022.
- 7. All statements in this declaration are based on my own personal knowledge and observation and from my review of the court and business records in this case, or upon information and belied as indicated. If called to testify on this matter, I can and would competently testify to the matters set forth in this Declaration.

DECLARATION OF PATRICIA A. SAVAGE IN SUPPORT OF MOTION PURSUANT TO FED. R. BANKR. PROC. 7015 AND 7017 TO ENLARGE TIME TO FILE PROOF OF CLAIM PURSUANT TO FED. R. BANKR. PROC. 9006(B)(1) – 2

1	I declare under penalty of perjury pursuant to the laws of the United States of
2	America that the foregoing is true and correct.
3	
4	Executed this 16 day of August 2022, in Chico, California.
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8	Dated: August 16, 2022 Patricia Savage
9	Patricia A. Savage
10	Attorney for Claimants and Movants
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DECLARATION OF PATRICIA A. SAVAGE IN SUPPORT OF MOTION PURSUANT TO FED. R. BANKR. PROC. 7015 AND 7017 TO ENLARGE TIME TO FILE PROOF OF CLAIM PURSUANT TO FED. R. BANKR. PROC. 9006(B)(1) - 3

Exhibit 2

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UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:

PG&E CORPORATION,
- and PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Bankruptcy Case No. 19-30088 (DM)

Chapter 11 (Lead Case) (Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

P	Part 1: Identify the Claim				
1.	Who is the current creditor?	James P. Hughes Name of the current creditor (the person or entity to be paid for this claim)			
2.	Has this claim been acquired from someone else?	✓ No Yes. From whom?			
3.	Are you filing this claim on behalf of your family? A family is a group of two	✓ No✓ If you checked "Yes", please provide the behalf of:✓ Yes	ne full name of each family member that you are filing on		
	or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.				
4.	Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)		
	Federal Rule of	Name Savage & Lamb, PC	Name		
	Bankruptcy Procedure	Attorney Name (if applicable) E. Ryan Lamb	Attorney Name (if applicable)		
	(FRBP) 2002(g)	Attorney Bar Number (if applicable) 266850	Attorney Bar Number (if applicable)		
		Street Address 1550 Humboldt Road	Street Address		
		City Chico	City		
		State CA	State		
		Z _{IP} Code_95928	Zip Code		
		Phone Number 5303421476	Phone Number		
		Email Address erlamblaw@gmail.com	Email Address		
5.	Does this claim amend one already filed?	No Yes. Claim number on court claims registry (ifknown)	Filed on		
6.	Do you know if anyone else has filed a proof of claim for this claim?	✓ No ✓ Yes. Who made the earlier filing?			

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P	Give Information	on Al	pout the Claim as of the Date this Claim Form is Filed
7.	What fire is the basis of your claim? Check all that apply.		Camp Fire (2018) North Bay Fires (2017) Shost Ship Fire (2016)
		=	Butte Fire (2015)
			Other (please provide date and brief description of fire:
		_	
8.	What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.?	L	.ocation(s): 3435 Graham Road, Paradise, CA 95969
9.	How were you and/or your family harmed?	V	Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage)
	-		Owner Renter Occupant Other (Please specify)
	Check all that apply	\checkmark	Personal Injury
			Wrongful Death (if checked, please provide the name of the deceased)
			Business Loss/Interruption
			Lost wages and earning capacity
		\mathbf{V}	Loss of community and essential services
		Н	Agricultural loss
L		<u>Ц</u>	Other (Please specify):
10.	What damages are you and/or your family	Z	Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage)
	claiming/seeking?	Z	Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage)
	Check all that apply	V	Punitive, exemplary, and statutory damages
		$\overline{\mathbf{Z}}$	Attorney's fees and litigation costs
		$\overline{\mathbf{Z}}$	Interest
		M	Any and all other damages recoverable under California law
			Other (Please specify):
11.	How much is the claim?		÷
			\$(optional)
ı		7	Unknown / To be determined at a later date

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Part 3:

Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.

18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate bo	Check	the	appro	oriate	box
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☐ I am the creditor.

I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature:

Email: erlamblaw@gmail.com

Signature

Print the name of the person who is completing and signing this claim:

Name	Eric R Lamb			
	First name	Middle name		Last name
Γitle	Attorney			
Company	Savage & Lamb, F	C		
• •	Identify the corporate service	r as the company if the aut	horized agent i	s a servicer.
Address	1550 Humboldt Ro	oad		
	Number Street			
	Chico		CA	95928
	City		State	ZIP Code
Contact phone	5303421476		Email	erlamblaw@gmail.com

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Attach Supporting Documenta	tion (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):
I have supporting documentation. (attach below)	I do not have supporting documentation.

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

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Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- Fill in all of the information about the claim as of the date this claim form is filed.
- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- For a minor child, fill in only the child's initials and the full name of the child's parent or guardian. For example, write A.B., a minor child (John Doe, parent). See Bankruptcy Rule 9037.
- You may but are not required to attach supporting documents to this form.
 Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. See the definition of redaction of information below.
- Do not attach original documents because attachments may be destroyed after scanning.
- Question 3. Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- Question 9. If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- Question 10. This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- Question 11. You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at

https://restructuring.primeclerk.com/pge.

Understand the terms used in this form

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Proof of claim: A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC Grand Central Station, PO Box 4850 New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC 850 Third Avenue, Suite 412 Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):

Chico Service Center 350 Salem Street Chico, CA 95928

Marysville Service Center 231 "D" Street Marysville, CA 95901

Napa Service Center 1850 Soscol Ave. Ste 105 Napa, CA 94559

Oroville Service Center 1567 Huntoon Street Oroville, CA 95965

Redding Service Center 3600 Meadow View Road Redding, CA 96002

Santa Rosa Service Center 111 Stony Circle Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.

Do not file these instructions with your form

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:

PG&E CORPORATION,
- and PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Bankruptcy Case No. 19-30088 (DM)

Chapter 11 (Lead Case) (Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 201 9) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both, 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

F	art 1: Identify the Cl	aim	
1.	Who is the current creditor?	Sierra S. Metz Name of the current creditor (the person or entity to be paid for this cla	aim)
2.	Has this claim been acquired from someone else?	✓ No ✓ Yes. From whom?	
3.	Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	No If you checked "Yes", please provide to behalf of: Yes	the full name of each family member that you are filing on
4.	Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name Savage & Lamb, PC Attorney Name (if applicable) E. Ryan Lamb Attorney Bar Number (if applicable) 266850 Street Address 1550 Humboldt Road, Ste 4 City Chico State CA Zip Code 95928 Phone Number 5303421476 Email Address erlamblaw@gmail.com	Attorney Bar Number (if applicable) Street Address City State Zip Code
5.	Does this claim amend one already filed?	No Yes. Claim number on court claims registry (ifknown)	Filed on
6.	Do you know if anyone else has filed a proof of claim for this claim?	No Yes. Who made the earlier filing?	

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Pa	Give Informati	on About the Claim as of the Date this Claim Form is Filed
7.	What fire is the basis of your claim? Check all that apply.	Camp Fire (2018) North Bay Fires (2017) Ghost Ship Fire (2016) Butte Fire (2015) Other (please provide date and brief description of fire:
8.	What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.?	Location(s): 3435 Graham Road, Paradise, CA 95969
9.	How were you and/or your family harmed?	Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) Owner Renter Occupant Other (Please specify):
	Check all that apply	Personal Injury Wrongful Death (if checked, please provide the name of the deceased) Business Loss/Interruption Lost wages and earning capacity Loss of community and essential services Agricultural loss Other (Please specify):
10.	What damages are you and/or your family claiming/seeking? Check all that apply	 ✓ Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage) ✓ Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage) ✓ Punitive, exemplary, and statutory damages ✓ Attorney's fees and litigation costs ✓ Interest ✓ Any and all other damages recoverable under California law Other (Please specify):
11.	How much is the claim?	\$(optional) Unknown / To be determined at a later date

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Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.

18 U.S.C. §§ 152, 157, and 3571.

☐ I am the creditor.

I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: <u>E. KYAN L</u>

Email: erlamblaw@gmail.com

Signature

Print the name of the person who is completing and signing this claim:

Name	E. Ryan Lamb			
	First name	Middle name	Last name	
Title	Attorney			
Company	Savage & Lamb, I	PC PC		
	Identify the corporate service	r as the company if the authorized ag	ent is a servicer.	
Address	1550 Humboldt R	oad		
	Number Street			
	Chico	CA	95928	
	City	State	ZIP Code	
Contact phone	5303421476	Email	erlamblaw@gmail.co	m

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Attach Supporting Document	ation (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):
I have supporting documentation.	I do not have supporting documentation.

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

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Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- Fill in all of the information about the claim as of the date this claim form is filed.
- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- For a minor child, fill in only the child's initials and the full name of the child's parent or guardian. For example, write A.B., a minor child (John Doe, parent). See Bankruptcy Rule 9037.
- You may but are not required to attach supporting documents to this form.

 Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. See the definition of redaction of information below.
- Do not attach original documents because attachments may be destroyed after scanning.
- Question 3. Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- Question 9. If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- Question 10. This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- Question 11. You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at

https://restructuring.primeclerk.com/pge.

Understand the terms used in this form

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Proof of claim: A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redactor leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC Grand Central Station, PO Box 4850 New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC 850 Third Avenue, Suite 412 Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):

Chico Service Center 350 Salem Street Chico, CA 95928

Marysville Service Center 231 "D" Street Marysville. CA 95901

Napa Service Center 1850 Soscol Ave. Ste 105 Napa. CA 94559

Oroville Service Center 1567 Huntoon Street Oroville, CA 95965

Redding Service Center 3600 Meadow View Road Redding, CA 96002

Santa Rosa Service Center 111 Stony Circle Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.

Do not file these instructions with your form

Exhibit 3

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and PACIFIC GAS AND ELECTRIC
COMPANY,

Bankruptcy Case No. 19-30088 (DM)

Debtors.

Chapter 11 (Lead Case) (Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

P	art 1: Identify the Cl	aim		
1.	Who is the current creditor?	Savannah Da	wn Gallardo reditor (the person or entity to be paid for this cla	im)
2.	Has this claim been acquired from someone else?	No Yes. From who	m?	
3.	Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	☑ No ☑ Yes	If you checked "Yes", please provide the behalf of: Dylan Harry Bartels	he full name of each family member that you are filing on
4.		Name Savage & Attorney Name (if applica	_{bble)} E. Ryan Lamb _{applicable)} 266850 Humboldt Road, Ste 4	Attorney Bar Number (if applicable) Street Address City. State Zip Code Phone Number
5.	Does this claim amend one already filed?	✓ No ✓ Yes. Claim nu	mber on court claims registry (ifknown)	Filed on
6.	Do you know if anyone else has filed a proof of claim for this claim?	No Yes. Who made	e the earlier filing?	

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Pa	Give Informati	on About the Claim as of the Date this Claim Form is Filed
7.	What fire is the basis of your claim? Check all that apply.	Camp Fire (2018) North Bay Fires (2017) Ghost Ship Fire (2016) Butte Fire (2015) Other (please provide date and brief description of fire:
8.	What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.?	Location(s): 14371 Vine Street, 3 Magalia, CA 95954
9.	How were you and/or your family harmed? Check all that apply	Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) Owner Renter Occupant Other (Please specify). Personal Injury
		Wrongful Death (if checked please provide the name of the deceased) Business Loss/Interruption Lost wages and earning capacity Loss of community and essential services Agricultural loss Other (Please specify): Any other relief deemed appropriate
10.	What damages are you and/or your family claiming/seeking? Check all that apply	 Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage) Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage) Punitive, exemplary, and statutory damages Attorney's fees and litigation costs Interest
11	. How much is the claim?	Any and all other damages recoverable under California law Other (Please specify): \$

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Part 3:

Sign Below

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Contact phone

he person completing	Check the approp	oriate box:	· · ·			**
ign and date it.	I am the cree					
RBP 9011(b).	1 am the cre	ditor's attorney or	authorized agent.			
you file this claim lectronically, FRBP 005(a)(2) authorizes courts	I have examined and correct.	the information in	this <i>Proof of Clai</i>	m and have a reas	onable beli	ef that the information is true
establish local rules	I declare under p	enalty of perjury t	hat the foregoing	is true and correct.		
pecifying what a signature	Signatur	e: E. Ryan L	amb			
person who files a audulent claim could be ned up to \$500,000,	Ema	il: erlamblaw	@gmail.com			
nprisoned for up to 5 ears, or both. 8 U.S.C. §§ 152, 157, and 571.	Signature					
	Print the name	of the person wh	o is completing a	and signing this o	laim:	
	Name	Eric Ryan	Lamb			
		First name	N	liddle name		Last name
	Title	Attorney		±±.		
	Company	Savage &	Lamb, PC			
	Company			company if the author	ized agent is	a servicer.
	Address	1550 Hum	boldt Road			
		Number	Street			
		Chico			CA	95928
		City			State	ZIP Code
	Contact phone	53034214	76		Email	erlamblaw@gmail.com

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Attach Supporting Documenta	tion (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):
▼ I have supporting documentation. (attach below)	☐ I do <u>not</u> have supporting documentation.

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

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Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

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- Question 10. This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- Question 11. You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

Confirmation that the claim has been filed

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https://restructuring.primeclerk.com/pge.

Understand the terms used in this form

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Debtor: A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

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Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC Grand Central Station, PO Box 4850 New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center c/o Prime Clerk LLC 850 Third Avenue, Suite 412 Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. — 5:00 p.m. Prevailing Pacific Time):

Chico Service Center 350 Salem Street Chico, CA 95928

Marysville Service Center 231 "D" Street Marysville, CA 95901

Napa Service Center 1850 Soscol Ave. Ste 105 Napa, CA 94559

Oroville Service Center 1567 Huntoon Street Oroville, CA 95965

Redding Service Center 3600 Meadow View Road Redding, CA 96002

Santa Rosa Service Center 111 Stony Circle Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.

Do not file these instructions with your form

1 2 3 4	PATRICIA A. SAVAGE, SBN 236235 SAVAGE & LAMB, PC 1550 Humboldt Road, Suite 4 Chico, CA 95928 1550 Humboldt Road, Suite 4 Chico, CA 95928 Telephone: (530) 592-3861 Fax: (530) 592-3865	
5	INITED STATES DA	NKRUPTCY COURT
6		ORNIA, SAN FRANCISCO DIVISION
7 8	In re) (Case No. 19-30088-DM
9		Chapter 11 Lead Case, Jointly Administered
10 11	PACIFIC GAS AND ELECTRIC)	PROOF OF SERVICE
12) 1	Date: September 13, 2022 Fime: 10:00 a.m. (Pacific Time) Place: Telephonic/Video Appearances Only
13		United States Bankruptcy Court Courtroom 17, 450 Golden Gate Ave., 16th Floor
14 15		San Francisco, CA Judge: Hon. Dennis Montali
16		Objection Date: August 30, 2022
17	CERTIFICAT	E OF SERVICE
18	I, Brandie Bridgnell, do declare and st	ate as follows:
19	I am employed at Savage & Lamb, PC	, the attorneys that represent the Movants,
20	James Hughes and Sierra Metz, and D	ylan Bartels and Savannah Gallardo, in the
21	- 11	cy case and am not a party to the action.
22	2. On August 16, 2022, I served the folio	wing documents by the method set forth on
23 [†] 24	the Master Service List attached hereto	as Exhibit "A":
∠ ⊣		

- NOTICE OF HEARING PURSUANT TO FED. R. BANKR. PROC. 7015 AND 7017 TO ENLARGE TIME TO FILE PROOF OF CLAIM PURSUANT TO FED. R. BANKR. PROC. 9006(b)(1) (the "Notice of Hearing")
- MOTION PURSUANT TO FED. R. BANKR. PROC. 7015 AND 7017 TO

 ENLARGE TIME TO FILE PROOF OF CLAIM PURUSANT TO FED. R. BANKR.

 PROC. 9006(b)(1) (the "Motion")
- ORDER GRANTING MOTION TO ALLOW/DEEM TIMELY LATE FILING OF
 CLAIM BY JAMES HUGHES AND SIERRA METZ, AND DYLAN BARTELS
 AND SAVANNAH GALLARDO (the "Order")
- DECLARATION OF PATRICIA A. SAVAGE IN SUPPORT OF MOTION

 PURSUANT TO FED. R. BANKR. PROC. 7015 AND 7107 TO ENLARGE TIME

 TO FILE PROOF OF CLAIM PURSUANT TO FED. R. BANKR. PROC. 9006(b)(1)

 (the "Declaration of Patricia Savage, Exhibit "1"")
- PROOFS OF CLAIM FILED BY MOVANTS ATTORNEY (the "Proof of Claim Exhibit "2", "3"")
- 3. On August 16, 2022, at the direction of Patricia A. Savage, attorney at Savage & Lamb, PC, caused the Notice of Hearing, Motion, Order, the Declaration of Patricia Savage, and Exhibits "2" & "3", to be served via first class mail and email on Abbey, Weitzenberg, Warren & Emery, P.C., Attn: Brendan M. Kunkle, Michael D. Green, 100 Stony Point Road, Suite 200, Santa Rosa, CA 95401, bkunkle@abbeylaw.com; mgreen@abbeylaw.com., Corey, Luzaich De Ghetaldi & Riddle LLP, Attn. Dario De Ghetaldi, Amanda L. Riddle, 700 El Camino Real PO BOX 669, Millbrae, CA 94030, deg@coreylaw.com, alr@coreylaw.com, Danko Meredith Attn: Kristine K. Meredith, 333 Twin Dolphin Dr. Ste. 145, Redwood Shores, CA 94605,

1		kmeredith@dankolaw.com, Gibbs Law Group LLP, Attn: Eric Gibbs, Dylan Hughes,
2		505 14th St. Ste 1110 Oakland, CA 94612, ehg@classlawgroup.com,
3		dsh@classlawgroup.com; via email to PG&E Counsel, Kevin Kramer,
4		Kevin.Kramer@weil.com.
5	4.	I have reviewed the Notices of Electronic Filing for the above-listed documents, and I
6		understand that parties listed in each NEF as having received notice through
7		electronic mail were electronically served with that document through the Court's
8		Electronic Case Filing system.
9	5.	I declare under penalty of perjury under the laws of the United States of America, that
10		the foregoing is true and correct and that if called upon as a witness, I could and
11		would competently testify thereto.
12		
13		Executed this 16 day of August 2022, at Chico, California.
14		
15		Brandie Bridgnell
16		Brandle Bridghen
17		
18		
19		
20		
21		
22		
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24		

Exhibit A

OCCUPATION	I was a supplemental to the supplemental to th	Seven States	ADDRESS 1	ADDRESS 2	Ē	7ATE 21P CA	COUNTRY PHONE	1	(Adjuste The Adjust am som
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